There is no basis provided in the proposed rulemaking for excluding digital TV broadcast antennas from the EA requirement. Due to the very high power of these antennas and the increasing pressure to locate them in populated areas, their proponents should be required to do an EA.

The MPE levels that FCC continues to use in paractice and in this proposed rulemaking are demonstrably inadequate for long term chronic exposures to EMR. An updated opinion of the NCRP on this subject should be requested by the FCC.